

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 2:19-cv-00506

INTEGRATED COMMUNITY SERVICES
OF PARKERSBURG, INC., formerly known
as Worthington Mental Health Services, Inc.,
and ROGER BRADLEY,

Defendants.

**REQUEST OF THE UNITED STATES OF AMERICA FOR ENTRY OF
DEFAULT AGAINST DEFENDANT ROGER BRADLEY, INDIVIDUALLY,
AND IN HIS CAPACITY AS PRESIDENT OF INTEGRATED
COMMUNITY SERVICES OF PARKESBURG, INC.**

Pursuant to Fed.R.Civ.P. 55(a), plaintiff United States of America (“United States”) requests that the Clerk enter the default of Roger Bradley (“Bradley”), both individually and as President of Integrated Community Services of Parkersburg, Inc. (“ICS”) because Bradley has failed to appear, plead, or otherwise respond to the Complaint or this civil action within the time required by law. The United States further states as follows:

1. The Complaint was filed in this civil action on July 10, 2019. See ECF No. 1. A summons was issued by the Clerk on July 10, 2019. See ECF No. 3.
2. A copy of the summons and complaint was served upon Bradley in his individual capacity and as President of ICS on September 4, 2019. See ECF Nos. 8 and 9. Bradley has failed to appear, plead, or otherwise respond to the Complaint, individually or as President of ICS, in this civil action within the time required by law, and the time for doing so under Fed.R.Civ.P. 4(e),(h)(1)(B) and Fed.R.Civ.P. 12(a)(1)(A)(i) has now expired.

3. Pursuant to Fed.R.Civ.P. 55(a), “When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.”

4. The United States has met the procedural requirements for obtaining entry of default as demonstrated by the record before the Court, namely ECF Nos. 1, 8, and 9, and the failure of Bradley to appear, plead, or otherwise respond to the Complaint, individually, and as President of ICS, in this civil action within the time required by law.

Therefore, the United States respectfully requests that the Clerk enter default against Bradley, individually and in his capacity as President of ICS, upon the record of the Court.

Respectfully submitted.

MICHAEL B. STUART
United States Attorney

s/Fred B. Westfall, Jr.
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Counsel for Plaintiff United States of
America

CERTIFICATE OF SERVICE

I, Fred B. Westfall, Jr., Assistant United States Attorney for the Southern District of West Virginia, hereby certify that on December 19, 2019, I electronically filed the foregoing **REQUEST OF THE UNITED STATES OF AMERICA FOR ENTRY OF DEFAULT AGAINST DEFENDANT ROGER BRADLEY, INDIVIDUALLY, AND IN HIS CAPACITY AS PRESIDENT OF INTEGRATED COMMUNITY SERVICES OF PARKESBURG, INC.**, with the Clerk of the Court and also served a copy thereof upon the following person and entities by United States mail:

Integrated Community Services of Parkersburg, Inc.
c/o West Virginia Secretary of State
Statutory attorney-in-fact
Building 1 Suite 157-K
1900 Kanawha Boulevard East
Charleston, WV 25305
Statutory attorney-in-fact for Integrated Community Services of Parkersburg, Inc.

Integrated Community Services of Parkersburg, Inc.
4200 Emerson Avenue
Parkersburg, West Virginia 26104
(last known address)

Roger Bradley, Individually and as President of Integrated Community Services of Parkersburg, Inc.
4200 Emerson Avenue
Parkersburg, West Virginia 26104
(last known address)

s/Fred B. Westfall, Jr.
WV State Bar No. 3992
Assistant United States Attorney
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